

**IN THE UNITED STATES DISTRICT  
COURT NORTHERN DISTRICT OF  
ILLINOIS EASTERN DIVISION**

**EDWARD SANTIAGO**, on behalf  
of himself and his minor son, **J.S.**,  
and **EDWARD SANTIAGO, J.R.**

Plaintiffs,

vs.

**VILLAGE OF WESTCHESTER**,  
a Municipal Corporation;  
**MARK BORKOVEC**, a Westchester  
Deputy Chief of Police;  
**JERRY DILDINE**, a Westchester  
Police Officer;  
**VINCE LAMANNA**, a Westchester  
Police Sergeant;  
**MICHAEL FELLERS**, a Westchester  
Police Sergeant;

Defendants.

Case No. 22-cv-07344  
Judge Andrea R. Wood  
Magistrate Judge Young B. Kim

**AGREED MOTION FOR  
APPROVAL OF SETTLEMENT**

The Plaintiffs, EDWARD SANTIAGO, on behalf of himself and his minor son, J.S., and EDWARD SANTIAGO, JR., by and through their attorneys of DVORAK LAW OFFICES, LLC and LAW OFFICES OF AL HOFELD, JR., LLC, hereby move this Court to approve a settlement reached, in principle, by the parties. In support of this motion, the Plaintiffs state the following:

1. The Parties have agreed to a settlement whereby the Plaintiffs would release the Defendant Village for \$700,000.00, with each side bearing their own fees and costs.

2. The settlement in principle was approved by the Defendant Village's Board on or about April 22, 2025.
3. Pursuant to the Plaintiffs' contract with counsel, the Plaintiffs' attorneys shall be paid a 33.33% contingency fee of \$233,310.00. A 33.33% contingency fee was approved by the Circuit Court of Cook County Probate Division with respect to a previous settlement in this case with the Village of Broadview (order entered May 25, 2023, *Estate of Julian Xavier Santiago*, Cook County Circuit Court Case No. 2023P001052) (Exhibit A, p. 3).
4. The Plaintiffs shall also pay counsel \$3,433.12 in costs per the itemization below:

Date	Item	Amount
8/28/2024	RedHawk Investigations (Site Inspection)	\$2,275.00
3/24/2023	Remys Parking (Site Inspection)	\$18.72
12/30/2022	Filing fee	\$402.00
	3,687 pages of discovery (20 cents per page, per contract)	\$737.4
	<b>TOTAL:</b>	<b>\$3,433.12</b>

5. The remainder shall be distributed evenly between the Plaintiffs, with the minor J.S.'s portion being distributed to his guardian, the Plaintiff

EDWARD SANTIAGO, to be deposited in an account at JP Morgan Chase Bank, NA, to be held there subject to further order of court, or released to the minor Plaintiff J.S., without court order, upon J.S. reaching the age of majority, as previously ordered by the Probate Court (Exhibit A, p. 2).

WHEREFORE, for all of the reasons stated above, the Plaintiffs ask that this Court approve the settlement reached by the Parties.

Date: May 1, 2025

Respectfully submitted,

/s/Richard Dvorak

Richard Dvorak  
Adrian Bleifuss Prados  
DVORAK LAW OFFICES, LLC

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### CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on May 1, 2025, he caused a copy of the above document to be served upon counsel of record, via the Court's electronic filing system.

Respectfully submitted,

/s/Richard Dvorak

Richard Dvorak  
Adrian Bleifuss Prados  
DVORAK LAW OFFICES, LLC

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